

reference of Yang does not disclose or make obvious a telecommunications system or a telecommunications method having the features claimed in the present application.

Yang merely describes in general terms a concept for providing telephone services through the Internet. According to Yang, a local call may be placed to an Internet server which "acts as a gateway between the telephone network and the Internet", and which "will have both interfaces to a computer network and the telephone network". The only hardware described are "commercial telephone interface cards available on the market". There is no description whatsoever of the additional components that would be required to reduce the Yang concept to practice or how these additional components should be interconnected with the "commercial telephone interface cards available on the market". It follows that the disclosure of Yang clearly is not sufficient to enable a person of ordinary skill in the art to assemble a telecommunication system capable of reducing Yang's concept to practice.

① For example, there is no teaching or suggestion whatsoever in Yang of an originating gateway computer comprising a component for converting voice originated signals from an originating circuit-switched network into packets of digital data, or a component for routing the digital packets through a packet-switched network from the originating gateway computer to a terminating gateway computer, as are described in independent claim 1. As described in new dependent claim 26, the routing component of the originating gateway computer may comprise an address resolution logic and a network routing data base implemented with a central processing unit (page 8, lines 1-5, and items 45 and 46 in Fig. 3b of the application).

② Furthermore, Yang's concept contemplates merely dialing the telephone number of an Internet server that has a conventional modem. It is quite clear that Yang does not in any way contemplate the possibility of a system and method for accomplishing a dedicated service with a hybrid packet-switched and circuit-switched telephony (HPCT) as shown in items (1) to (3) of Fig. 7 and described in the application from page 15, line

20, to page 17, line 15. Such a dedicated telecommunication system and method are defined in claims 31 and 37, respectively.

To utilize a dedicated address, it is particularly beneficial to include in the originating gateway computer a component for out of band signalling, such as component 18 in Fig. 3(a). This feature is defined in claim 28. Out of band signalling pursuant to the protocol of signalling system 7 (SS 7) facilitates having the local exchange carrier provide immediate routing to a default originating gateway computer and the caller with all of the features in the feature group to which the caller has subscribed.

Claims 27, 29-30 and 32-36 have also been added to describe additional features of the present invention which are not in any way taught or suggested by Yang. The feature of claim 27 is represented by item 43 in Fig. 3b. The features of claims 29 and 30 are represented by items 16-19, 21-23 and 29 in Fig. 3a. The feature of claim 32 is represented by items 45 and 48 in Fig. 3b. The feature of claim 33 is represented by item (9) in Fig. 6, items 22 or 23 in Fig. 3a and item 42 in Fig. 3b. The features of claim 34 are represented by items (4)-(6) in Fig. 5. The features of claim 35 are represented by items (1)-(6) in Fig. 7. The feature of claim 36 is represented by item (13) in Fig. 5 and item (8) in Fig. 7.

None of the foregoing features of the claimed invention are taught by the Yang reference. It follows that this reference does not disclose or make obvious the telecommunications system or method of the present invention.

The additional references cited by the Office on Form PTO-892 have been reviewed and are believed to be readily distinguishable from the claimed invention for reasons similar to those presented above with respect to the applied reference. These additional references have not been addressed more specifically because they were not applied against the claims.

In conclusion, the claimed invention provides a novel and unobvious telecommunications system and method wherein originating digital packets from an originating network are routed to a gateway computer through a packet-switched network in response to an originating routing component in at least one of the originating network and the gateway computer, wherein the originating digital packets are converted into terminating signals which are transmitted through a circuit-switched network to provide terminating voice output, wherein return signals are provided to the gateway computer in response to return voice input into the circuit-switched network and are converted there into return digital packets, and wherein the return digital packets are routed through the packet-switched network from the gateway computer to the originating network in response to the originating routing component or another routing component in the originating network or in the gateway computer. Additional novel and unobvious features of the invention are described in the independent and dependent claims now in the application. Neither these features nor their corresponding functions are taught or suggested by the prior art references, either alone or in proper combination.

In view of the foregoing amendments and remarks, it is believed that each of the claims now in the application defines an invention that is novel and unobvious over the prior art, and that these claims are patentable under 35 U.S.C. §102 and §103. Accordingly, reconsideration of the application and allowance of the claims as now presented are earnestly requested.

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Respectfully submitted,

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